

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	1:17CR146-1
	:	
v.	:	
	:	
TODD MICHAEL GORI	:	FACTUAL BASIS

NOW COMES the United States of America, by and through Sandra J. Hairston, Acting United States Attorney for the Middle District of North Carolina, and as a factual basis under Rule 11, Fed. R. Crim. P., states the following:

TSI Healthcare, Inc., is a corporation based in Chapel Hill, N.C., founded in 1997, and doing business in interstate and foreign commerce in the sales and support of customized software for healthcare practice management and of electronic health record software. TODD MICHAEL GORI lived in the State of Washington in 2016. On April 18, 2016, GORI sent an email message from the State of Washington to the State of North Carolina, addressed to TSI Healthcare, Inc., which stated in relevant part:

hello,

This is [information identifying other party redacted]. I am giving you, TSI healthcare two choices. You either lay-off [identity redacted] and replace

her with me, an operator 100x better that she is oppressing. Or I will take out your entire company along with my comrades via a cyber attack.

Again you have two choices. Get ride of her and hire me. Or slowly be chipped away at until you are gone. She is a horrible operator that can only manage 2 screens with an over inflated travel budget. I fly at least 10x as many places as this loon on 1/5th of the budget.

I have petitioned for a job with you guys with her as a reference as I am a felon with computer skills and need assistance getting work as technically I have "no work history". She declines everytime and burries me even further. I even stated this straight from TSI website "Center for Generational Kinetics Best Places to Work for Millennials Top 75 Millennial Employer in the U.S. 2015" ... I'm giving you guys 72 hours to respond until the attack goes full scale. There is nothing that can be done to stop the attacks. I have ran multiple penetration tests on your entire network and your company fails miserably.

Again let me be clear. The only way I will work with TSI and stop the attack is to fire [identifying information redacted] and hire me and ensure I am compensated enough

This is not a threat this is not a means of leverage this is saving myself and [identifying information redacted] and if you do not comply you can

prepare for the most annoying and pesky uphill cyber battle your company has ever seen. She will also be blocked from working while the attack is taking place. If it has to take place in it's entirety as it has already begun.

Upon receiving this message, employees of TSI Healthcare, Inc., understood it to be a threat to cause damage to its computers, and reported this threat to the Federal Bureau of Investigation. The computers used by TSI Healthcare, Inc., in conducting its business are used in or affecting interstate or foreign commerce or communication, and are thus “protected computers” as defined in 18 U.S.C. § 1030(e)(2)(B). Further communications from GORI were made from outside of the State of North Carolina to TSI Healthcare, Inc., inside the State of North Carolina, in which GORI made more threats to damage computers belonging to TSI Healthcare, Inc.

This the 28th day of August, 2017.

Respectfully submitted,
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/s/ ANAND P. RAMASWAMY
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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2017, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kathleen A. Gleason, AFD

Respectfully submitted,

SANDRA J. HAIRSTON
ACTING UNITED STATES ATTORNEY

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